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7 **Attorneys for Plaintiff**
8 **Modesta Manglona Nadar**

9 **IN THE UNITED STATES DISTRICT COURT**
10 **FOR THE NORTHERN MARIANA ISLANDS**

11)	CIVIL CASE NO. 07-0023
12	MODESTA MANGLONA NADAR,)	
13)	
14	Plaintiff,)	
15)	
16	vs.)	PLAINTIFF'S PRE-DISCOVERY
17)	DISCLOSURE STATEMENT
18	EFREM S. TAIMANAO dba JOE &)	
19	SON'S ENT.,)	
20)	
21	Defendant.)	
22)	
23)	

24 COMES NOW, Plaintiff, by and through counsel, and hereby submits the following
25 pre-discovery disclosures pursuant to Federal Rule of Civil Procedure 26(A)(1) and Local Rule
26 16.2 CJ (d).

27 A. Persons With Potentially Discoverable Information

28 Modesta Manglona Nadar: Plaintiff. She has information as to the facts as alleged in
the Complaint. She can be contacted via the offices of Plaintiff's counsel.

Ponnu Nadar: Plaintiff's Husband. He has information as to the facts as alleged in the
Complaint. He can be contacted via the offices of Plaintiff's counsel.

1 Employee at Division of Immigration: May have information as to the June 16, 2005
2 incident.

3
4 B. Description of Relevant Document

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6 --photographs of Joe & Son's Bldg. and Division of Immigration office
7 --medical records of Plaintiff
8 --any documents identified by Defendant in response to discovery requests
9

10 C. Damages Claimed By Plaintiff

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12 Plaintiff claims damages for personal injury to include past and future medical expenses,
13 past and future impairment of the ability to enjoy life, mental anguish, physical suffering,
14 statutory damages and, where appropriate, pre-judgment interest. In addition, Plaintiff prays for
15 an injunction enjoining Defendant from its acts of discrimination under Title 3 of the ADA, and
16 compliance with the ADA. Plaintiff claims attorney fees and costs in this litigation.
17

18 Dated: November 14, 2007.

19 SMITH & WILLIAMS
20 Attorneys for Plaintiff Modesta M. Nadar

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22 By: /s/
Eric S. Smith
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